David W. Elmquist - SBT #06591300 **REED & ELMQUIST, P.C.** 501 N. College Street Waxahachie, Texas 75165 (972) 938-7339 1+(972) 923-0430 (fax)

#### ATTORNEYS FOR DF MARKET 2, LLC

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

In re:	§	
	§	
NOBLE REY BREWING CO., LLC,	§	CASE NO. 18-34214-BJH-11
,	§.	Hearing Date: June 7, 2019
Debtor.	§	Hearing Time: 10:00 a.m.

# AMENDED WITNESS AND EXHIBIT LIST OF DF MARKET 2, LLC FOR HEARING ON MOTION TO ASSUME AND ASSIGN LEASE

TO THE HONORABLE BARBARA J. HOUSER, UNITED STATES BANKRUPTCY JUDGE:

DF Market 2, LLC ("DFM2"), files this Amended Witness and Exhibit List for the June 7, 2019 hearing on the Debtor's Motion to Assume and Assign Lease, and respectfully designates the following potential witnesses and exhibits:

### Witnesses

- 1. Brian Bergersen.
- 2. David Elmquist.
- 3. Any witness identified or called by any other party.
- 4. Any rebuttal or impeachment witness.

#### **Exhibits**

### Tab Description

- 1. Lease Agreement between the Debtor and DFM2 dated April 13, 2015 with all exhibits.
- 2. Guaranty of Lease signed by Chris Rigoulot (Exhibit E to Lease Agreement).
- 3. Lonestar Liquid Assets Business Plan created May 2019.

- 4. Reed & Elmquist, P.C. invoice dated June 5, 2019.
- 5. David Stubblefield April 2019 invoice.
- 6. David Stubblefield May 2019 invoice.
- 7. DF Market 2, LLC's Lease Damages Calculation.
- 8. Any exhibit identified or offered by any other party.
- 9. Any rebuttal or impeachment exhibit.

Additionally, DFM2 expressly reserves the right to amend and add additional witnesses and exhibits, as they are determined to be relevant or helpful by DFM2 or the Court. Moreover, DFM2 reserves the right to use any pleadings or other documents filed in the bankruptcy case and to move the Court for additional relief, if necessary.

Dated: June 5, 2019. Respectfully submitted,

REED & ELMQUIST, P.C. 501 N. College Street Waxahachie, TX 75165 (972) 938-7339 (972) 923-0430 (fax)

By: /s/ David W. Elmquist

David W. Elmquist – SBT #06591300

ATTORNEYS FOR DF MARKET 2, LLC

## **CERTIFICATE OF SERVICE**

This is to certify that on June 5, 2019, a true and correct copy of the foregoing Amended Witness and Exhibit List was served on all parties that are registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District, which includes Debtor's counsel.

/s/ David W. Elmquist

David W. Elmquist